

## REMARKS

Claims 1-19 are pending in the application. Claims 1-19 stand rejected.

Applicant respectfully requests reconsideration in view of the foregoing amendments and the remarks hereinbelow.

### **Rejection of Claims under 35 U.S.C. 103:**

Claims 1, and 3-10 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Jain et al. (US 6,567,980), Takemoto (US 6,335,742) and Tomat et al. (US 6,784,925).

Jain et al. describes, generally, a video editor adapted to receive an analog video signal and to facilitate the process of organizing the video and audio content thereon into manageable video clips with associated metadata. In particular, Jain et al. describes a process for associating a clip track 332 with each video clip. Each clip track has metadata associated therewith. The metadata is application specific. (Col. 6, Lns. 61- 65) The metadata can include for example, a Story Title, Report, Location, Shot Data, Air Date, Keywords, Summary and so on. (Col. 7, Lns. 1- 10). Jain et al. however does not provide a GUI having a content category selection area adapted to allow selection of a content category; or a picture content iconic region, comprising a plurality icons, each representing a display level with pictures from said picture database having the selected content category and grouped according to picture metadata.

The remaining references do not provide these features. Tomat et al. describes picture groupings comprising: "film canister" metaphors in which pictures on a digital camera are grouped sequentially into film cans in the same manner generally that pictures on a film camera would be grouped by association on a common film roll. Tomat et al. also shows a multi-level layering of a group of pictures organized within an icon that has an appearance of one of the images in the group. However, in Tomat et al. it appears that the user manually organizes the image content to form the groups.

Takemoto et al. provides a method for conveniently showing picture content that has already been organized into files and folders and Balogh et al. provides a method for automatically associating metadata content with picture images and further allow for word searching of the pictures. However, in Balogh

et al., the search results are presented in list type formats and are not organized into groups for convenient access by a user.

Accordingly, claim 1 and all claims that depend therefrom are believed to be in a condition for allowance as they are new, novel, and non-obvious in view of the combination of references cited in the Office Action of December 28, 2004.

New independent claim 20 and new independent claim 23 have been added. These claims and all claims that depend therefrom are also believed to be in a condition for allowance.

It is respectfully submitted, therefore, that in view of the above amendments and remarks, that this application is now in condition for allowance, prompt notice of which is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Schindler II', with a long horizontal flourish extending to the right.

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